



FILED

DEC 1 1 2000

INDIANA UTILITY REGULATORY COMMISSION

CAUSE NO. 41657

IN THE MATTER OF THE PETITION OF INDIANA)
BELL TELEPHONE COMPANY, INCORPORATED,)
D/B/A AMERITECH INDIANA PURSUANT TO)
I.C. 8-1-2-61 FOR A THREE-PHASE PROCESS FOR)
COMMISSION REVIEW OF VARIOUS)
SUBMISSIONS OF AMERITECH INDIANA TO)
SHOW COMPLIANCE WITH SECTION 271(C) OF)
THE TELECOMMUNICATIONS ACT OF 1996)

You are hereby notified that on this date, the Indiana Utility Regulatory Commission has caused the following entry to be made:

The collaborative regarding the Master Test Plan ("MTP") is scheduled for December 12, 2000. The presiding officers remind the participants in this Cause of the August 29, 2000 Order in which the Commission found certain areas that need to be addressed and resolved prior to the submission of an MTP.

We are encouraged by the success of the negotiations in reaching accord on many issues. However, we are concerned that there were issues raised in the August 29, 2000 Order that have not been sufficiently addressed in the current version of the Indiana MTP (0.3 Draft). We want to afford the parties an opportunity to address our concerns and questions at the December 12 collaborative and therefore find it appropriate to attach certain instructions and questions to this entry.

We remind the parties that all of these areas need to be sufficiently addressed and explained in order for the presiding officers to recommend Commission approval of the MTP. Specifically, there is one area of major concern, and several areas in which we have a number of questions. The presiding judge issued an e-mail asking for a commitment date from KPMG regarding a Statement of Work ("SoW") document as part of the vendor roles and responsibilities issue discussed in the August 29, 2000 Order. KPMG's response was that the MTP suffices as a SoW document. That response is inadequate. We expect a separate document(s) defining the roles and responsibilities of the Vendors to be submitted in this Cause. It is our understanding that separate Statement of Work documents were submitted in the ROC proceeding. Therefore, KPMG and HP personnel working on 271 and OSS testing issues in the Ameritech region should contact their counterpart(s) in the ROC project for guidance as to what those Statement of Work documents are and what they include.¹ An Internet URL is provided in the Attachment that will allow parties to download several SoW documents from the ROC 271/OSS testing project for examples and illustrations. As stated in the Attachment, the Statement of Work document of Liberty Consulting (the PM Auditor for the ROC testing project), in particular, offers a good example of the level of structure and detail that the IURC expects. In addition, KPMG and HP should also address all of the relevant concerns, comments, and bullet points raised in the Attachment as part of those Statement of Work documents.

¹ While KPMG and HP's roles in Indiana will differ from their roles in the ROC project, we believe that KPMG and HP personnel in the ROC region can provide valuable information and guidance to their counterparts working on Indiana-related 271/OSS testing.

The Commission notes that the 'IURC CLEC Comments to Amend MTP Version 0.3' indicates that the status of all nine areas from the August 29 Order is closed. The presiding officers do not necessarily consider any of these nine areas to be closed at this time. Attached to this docket entry are specific questions about the following two areas in the August 29 Order: Regional Aspects of OSS Third-Party Testing [Paragraph C) 1] and Evaluation of Parity-by-Design [Paragraph C) 3]. The parties are directed to discuss these questions more fully at the MTP Collaborative Session on December 12. The next draft of the Indiana MTP (version 0.4 Draft) should reflect the responses to the attached questions, as well as to the clarification we are providing today on the concept "parity by design." To the extent that additional collaborative sessions are needed, the facilitator of the Indiana OSS testing collaboratives, Mr. John Kern, is directed to establish an appropriate schedule as soon as possible.

We offer the following observations regarding the remaining areas. We cannot determine whether Paragraph C) 2 "Statistical Methodology and Its Definition" should be considered closed until the Collaborative provides its recommendation(s) to the Commission on or after January 8, 2001. The Commission is also awaiting recommendations from the Collaborative regarding performance measures [Paragraph C) 5.]. Upon receipt of this recommendation(s), the presiding officers will determine whether this area should be considered closed.

Regarding Paragraph C) 9. "Vendor Roles and Responsibilities", the Commission is administratively aware that collaborative discussions have taken place regarding the interactions between and among various KPMG personnel, as well as various safeguards and "firewalls" to limit certain such interactions that could be considered inappropriate by some. The Commission is pleased that these discussions are occurring. Nonetheless, the presiding officers have concerns and questions regarding both the responses to Paragraph C) 9 received to date, and, more broadly, regarding the overall roles and responsibilities of KPMG and HP. The Statement of Work documents mentioned above and described more fully in the Attachment, while broader in some respects than what is required under Paragraph C) 9, should also allow the parties to provide a much more comprehensive, robust, and informative response. To be more specific, the presiding officers will not consider Paragraph C) 9 to be "closed" prior to approving the Statement of Work documents. Hence, because all nine areas from Paragraph C) of the August 29, 2000 Order must be addressed and resolved prior to the submission of a Master Test Plan, the Commission will not consider a Master Test Plan prior to approval of the Statement of Work documents.

Finally, the Commission is continuing its review of Indiana MTP Draft Version 0.3 and will provide further direction to the parties regarding the status of the remainder of the nine areas at a later date.

In summary, the Collaborative must address and resolve the nine areas listed in Paragraph C) of the August 29, 2000 Order to the Commission's satisfaction prior to submitting a final MTP to the Commission. There are, of course, many aspects of the MTP that are not included in these nine areas. The need for Commission approval extends to the entire MTP and is not limited to these nine areas.

Relationship between the Master Test Plan, the Statement of Work Documents, and the Contracts between SBC/Ameritech and KPMG and Hewlett-Packard, Respectively.

The Commission is administratively aware of statements to the effect that the Indiana scope of work document is subject to the Indiana MTP, as amended. In addition to requiring more comprehensive and robust Statement of Work documents than originally proposed in the OSS phase of this Cause, the Commission believes this relationship is stated incorrectly. The proper relationship is that the Indiana MTP should not contradict the scope of work documents, as explained more completely in the Attachment.

Furthermore, we also believe that the contracts that Ameritech signs with vendors KPMG and HP should not contradict the scope of work documents.

The Commission's August 29 Order (page 4) states that "The terms of the contract for hire of such [Test Administrator] shall be subject to Commission review and approval." That Order (page 4) also states that "By the terms of the hiring contract, the pseudo-PCLEC shall be subject to the direction of the Commission and/or its designated agents." The presiding officers want to make it clear to all parties that we will not recommend approval of the Indiana MTP to the Commission if either the MTP or the Statement of Work documents are superseded, contradicted, or limited by the vendor contracts, absent clear and compelling arguments why we should do so. This is consistent with the statement in the August 29 Order (page 4) that "the IURC wishes to make it clear that the vendors [KPMG and HP] shall take direction from the IURC in the execution of this test."

IT IS SO ORDERED.

David W. Hadley for:
Camie J. Swanson-Hull, Commissioner

[Signature]
Abby R. Gray, Administrative Law Judge

12/11/00
Date

Joseph M. Sutherland
Joseph M. Sutherland, Secretary to the Commission

Attachment

CAUSE NO. 41657

PART I: MINIMUM REQUIREMENTS FOR PREPARATION OF STATEMENT OF WORK DOCUMENTS FOR THE INDIANA OSS TESTING PHASE OF INDIANA'S SECTION 271 PROCEEDING

AFFECTED VENDORS: KPMG CONSULTING AND HEWLETT-PACKARD

Introduction

The 3rd party test of SBC/Ameritech's OSS is a complex project involving many parties and requiring a clear understanding of the roles and responsibilities of each party as well as the services and deliverables to be provided by each party. The IURC is concerned that the only reference to a statement of work (SoW) in the Indiana collaborative has been to a document describing the interactions between KPMG acting as the Pseudo-CLEC and HP acting as the Gateway Services Provider. Further, it has been stated that the Master Test Plan (MTP) will serve as the SoW document for KPMG. While the MTP does identify certain tasks that KPMG or other entities may perform in the context of the Indiana OSS 3rd party test, our preliminary review of the first three draft Indiana MTPs suggests that the primary function of the Indiana MTP is to explain how various functions or tasks will be performed, rather than to identify those functions or tasks, *per se*. The Commission believes that both questions are important – what will be done and how will it be done. The "answers" to both of these questions should be disclosed publicly and in writing, to the extent possible. Furthermore, for a project of this magnitude, much more attention must be paid to project planning, management, and administration questions and issues; this should be done primarily through the collective SoW documents.

There are five functionally different roles provided by two different vendors in the 3rd party test of SBC/Ameritech's OSS in Indiana

- Project Manager (KPMG)
- Test Administrator (KPMG)
- Pseudo-CLEC (KPMG)
- Gateway Services Provider (HP)
- Performance Measure Auditor (KPMG)

Neither the current "illustrative" contract between SBC/Ameritech and KPMG, nor the Master Test Plan (MTP) provides sufficient definition of the roles, responsibilities, services, and deliverables expected from KPMG and HP. The illustrative draft contract spells out some of the legal aspects of the relationship between the parties, but this document does not encompass the entire project. The MTP provides information on what the Test Administrator (TA) will do, but it also does not encompass the management and structure of the entire project. The Project Manager must manage the TA, Pseudo-CLEC

CAUSE NO. 41657

(P-CLEC), and Performance Measure Auditor (PMA), as entities involved in the OSS project. Their activities, in turn, have to be coordinated with the gateway services provider. The MTP is not a project plan and is not exhaustive of the services and deliverables that KPMG and HP must provide.

For these reasons, the IURC is directing KPMG and HP to provide to the IURC and to the Indiana Collaborative public, written Statements of Work for their areas of functional responsibility, prior to submission of the MTP to the Commission for final approval.

Accordingly, KPMG and HP must each provide to both the Indiana 271 Collaborative and the Commission a separate, public, written Statement of Work/Scope of Work document, consistent with the discussion and requirements herein.² KPMG's SoW document(s) must include or address, at a minimum, all items listed below, for all four of the roles that KPMG will undertake in the Indiana 3rd-party OSS test. HP's SoW document must include or address, at a minimum, all items listed below, for the role(s) that HP will undertake in the Indiana 3rd-party OSS test.

An SoW for a project of this magnitude is customary; we firmly believe it is also necessary. The SoWs provided by the vendors involved in the test of Qwest's OSSs – particularly the Liberty Consulting document - are representative of the scope and level of detail the IURC wishes to see. These SoWs; developed by KPMG (TA), HP (P-CLEC), and Liberty Consulting (PMA); can be found at <http://www.nrri.ohio-state.edu/oss/vendorsdocs.htm>.

KPMG may choose to provide a single document or four separate documents, but the document(s) should distinguish the four KPMG functions and provide an SoW for each function.

In addition, KPMG and HP should continue working on the Statement of Work on how the two will interact. The two vendors will also need to submit this SoW to both the Collaborative and the Commission prior to the submission of the MTP to the Commission for approval.

Appropriate parts of the SoW documents must be reflected in the MTP, prior to submission of the MTP for approval; other parts shall be reflected in the detailed project plan/work plan or the vendor contracts.

² As stated elsewhere, KPMG may elect to provide a single Statement of Work document addressing all four of its roles, or it may elect to provide a multiple Statement of Work documents. In either case, KPMG must address all four of its roles.

CAUSE NO. 41657

Definition

An SoW defines the roles, responsibilities, tasks, methodologies, assumptions, dependencies, services, and deliverables that are to be provided by a vendor to a client. The SoW codifies the vendor's understanding of the work to be performed, products and services to be delivered. It provides a benchmark that defines the work product and the structure and organization of an engagement.

This remainder of this document will describe in non-exhaustive bullet-point form the representative contents of an SoW for each of the five functional roles listed above. The SoW will describe the task to be done and how it will be done. For example: the Project Manager will develop a detailed work plan. The SoW, itself, will not constitute the work plan. Instead, it will note that work plan development is a task to be done by the Project Manager and will describe at a high level how the Project Manager will approach that task. Each bullet and sub-bullet below, plus additional bullets and sub-bullets as needed, should be expanded into one or more paragraphs in the SoW.

Project Manager

The SoW covering the Project Manager function should describe items including, but not limited to, the following:

- Overall project strategy and approach
- A detailed work plan covering all four KPMG functions
 - ◆ Schedule as agreed to by Collaborative and IURC
 - ◆ Major milestones
 - ◆ Deliverables (including interim and final deadlines, where applicable or when those deadlines can be known or estimated in advance)
 - ◆ PERT or other charts
 - ◆ Physical location of staff and resources (in Indiana, in another Ameritech state, other)
- Development of other planning or scheduling documents, as needed
- Project dependencies
- Assumptions
- Procedures for meetings and their documentation
- Communications procedures
 - ◆ Phone calls
 - ◆ Meeting announcements
 - ◆ Meeting documentation
 - ◆ Web postings

CAUSE NO. 41657

- Coordination procedures with the Gateway Services Provider
- Coordination procedures with SBC/Ameritech
- Escalation procedure to the Collaborative (if needed or appropriate)
 - ◆ Identification of the types of issues that should be discussed by the Collaborative (vs. decided at KPMG's discretion)
 - ◆ Identification of an issue at impasse
 - ◆ Position of parties
 - ◆ KPMG recommendation (where needed or appropriate)
 - ◆ Timetable for resolution
- Escalation procedure to the IURC
 - ◆ Identification of the types of issues that should be escalated to the Commission
 - ◆ Identification of an issue at impasse
 - ◆ Position of parties
 - ◆ KPMG recommendation
 - ◆ Timetable for resolution
- Project management methodology (for all KPMG roles)
- Resource staffing plan (for all four KPMG roles)
 - ◆ FOR ALL FOUR KPMG ROLES. Allocation of KPMG resources within the Ameritech region
 - ◆ Ramp up
 - ◆ Minimum staffing levels in Indiana
 - Full time
 - Part time
 - ◆ Minimum staffing levels in other locations
 - Full time
 - Part time
 - ◆ Contingency plans for unexpected resource demands
 - ◆ Ramp down
 - ◆ FOR ALL FOUR KPMG ROLES, AS APPLICABLE. Protection against diversion of KPMG resources from the SBC/Ameritech 271/OSS testing project (both regionally and Indiana-specific) to other jurisdictions or projects
 - Pre-Test
 - During Test
 - Post-Test
- Plan for firewalls to separate KPMG's functions and resources from each other where needed
- Post-test support for testimony, etc.

CAUSE NO. 41657

Test Administrator

The SoW covering the Test Administrator function should describe items including, but not limited to, the following:

- Preparation and maintenance of a master test plan (MTP)
- Development of planning or scheduling documents, as needed (e.g., Issues Logs). Examples of issues logs from the ROC may be found at: <http://www.nrri.ohio-state.edu/oss/issues.htm>
- Dependencies
- Assumptions
- Data stores
- Test scenarios
- Identification of potentially duplicative tests
- Allocation of scenarios to P-CLEC, CLEC, or friendlies
- Identification of test target switch types and software generics
- Test cases (at a level that will not compromise blindness)
- Test instances (at a level that will not compromise blindness)
- Manage tests
- Transmit, receive, and log transaction files to and from P-CLEC
- Analyze transaction files
- Arrange and conduct interviews and walk-throughs
- Manage exceptions and observations
- Manage retests
- Archive test results
- Assure statistical methodology is followed
- Provide at least one interim report
- Provide final report
- Provide post-test support for testimony, etc.

CAUSE NO. 41657

Pseudo-CLEC

The SoW covering the Pseudo-CLEC function should describe items including, but not limited to, the following:

- Development of planning or scheduling documents, as needed (e.g., Issues Logs).
- Dependencies
- Assumptions
- Perform necessary administrative and logistical tasks to enter CLEC business
 - ◆ Interconnection agreements
 - ◆ State certification
 - ◆ Office facilities
- Obtain interconnect and other telecom facilities
- Obtain necessary certification of operational readiness
- Provide report on P-CLEC “getting started” process, subject to appropriate blindness/unpredictability safeguards.
- Define customer and other testbed specifications
- Obtain customer service data from SBC/Ameritech for test accounts
- Design, load, validate, and maintain customer database
- Build interfaces to TA and Gateway Services Provider
- Transmit, receive, and log transaction files to and from TA
- Transmit, receive, and log transaction files to and from Gateway Services Provider
- Analyze transaction files
- Conduct transaction tests
- Conduct operational tests
- Manage exceptions and observations
- Provide at least one interim report
- Provide final report
- Provide post-test support for testimony, etc.
- Decommission facilities (must coordinate with ramp-down schedule, as well as with post-test safeguards against diversion of resources)

CAUSE NO. 41657

Gateway Services Provider

The SoW covering the Gateway Services Provider function should describe items including, but not limited to, the following:

- Overall strategy and approach as Gateway Services Provider
- A detailed work plan
 - ◆ Schedule as agreed by Collaborative and IURC
 - ◆ Major milestones
 - ◆ Deliverables (including interim and final deadlines, where applicable or when those deadlines can be known or estimated in advance)
 - ◆ PERT or other charts
 - ◆ Physical location of staff and resources (in Indiana, in another Ameritech state, in another SBC state; outside of SBC altogether)
- Development of other planning or scheduling documents, as needed (e.g., Issues Logs).
- Dependencies
- Assumptions
- Coordination procedures with the Project Manager, TA, and P-CLEC
- Build interfaces to P-CLEC and SBC/Ameritech
 - To the extent that HP maintains operations outside of Indiana, outside of Ameritech region, or outside of SBC states, there may be a need to isolate problems according to the particular carrier involved (systems, software, processes, interfaces, network infrastructure, etc.), so that /Ameritech/IBT does not get “blamed” for those problems. For example, if HP were to maintain a network operations center in Atlanta, GA, HP would need to interconnect somehow with Bell South. There would need to be some way to identify problems cause by Bell South or associated with Bell South’s network and to isolate those problems from ones caused by Indiana Bell or associated with the Ameritech/Indiana Bell network.
- Transmit, receive, and log transaction files to and from P-CLEC
- Transmit, receive, and log transaction files to and from SBC/Ameritech
- Analyze transaction files
- Manage exceptions and observations
- Project management methodology (for HP role only)
- Provide at least one interim report
- Provide final report
- Provide post-test support for testimony, etc.
- Resource staffing plan
 - ◆ Allocation of HP resources within the Ameritech region

CAUSE NO. 41657

- ◆ Ramp up
- ◆ Minimum staffing levels in and for Indiana
 - Full time
 - Part time
- ◆ Minimum staffing levels in other locations
 - Full time
 - Part time
- ◆ Contingency plans for unexpected resource demands
- ◆ Ramp down
- ◆ Protection against diversion of resources from the SBC/Ameritech 271/OSS testing project (both regionally and Indiana-specific) to other jurisdictions or projects
 - Pre-Test
 - During Test
 - Post-Test

Performance Measure Auditor

The SoW covering the Performance Measure Auditor function should describe items including, but not limited to:

- Development of planning or scheduling documents, as needed (e.g., Issues Logs).
- Dependencies
- Assumptions
- Audit objectives
- Audit PM data collection
- Audit PM results calculations
- Analyze data integrity (data capture, security, processing, analysis, and reporting)
- Compare auditor PM results with SBC/Ameritech PM results
- Analyze differences between auditor and SBC/Ameritech PM results
- Submit observations and exceptions
- Interim work products (including deadlines, where applicable or known in advance)
- Provide at least one interim report
- Proposed Post OSS test remedy plan
- Final report
- Provide post-test support for testimony, etc.

CAUSE NO. 41657

PART II: QUESTIONS RELATING TO MULTI-STATE VS. INDIANA-SPECIFIC TESTS AND KPMG's PHYSICAL PRESENCE IN INDIANA

The Indiana Utility Regulatory Commission (IURC) is the governmental unit with which the Federal Communications Commission must consult regarding any formal Section 271 application that SBC/Ameritech/Indiana Bell may submit in the future for the state of Indiana. This Commission is very interested in finding ways to foster the development of local exchange competition in the state of Indiana. The OSS testing efforts that we anticipate being conducted as part of Cause No. 41657 are important tools to help accomplish that objective. OSS testing will take place in other Ameritech states, as well. Indeed, pre-test activities are already underway in Michigan. An informal process exists in which resolution of issues in one Ameritech state (through a collaborative process involving SBC/Ameritech, CLECs, and other interested parties) can then become the basis for discussion in other Ameritech states. Sometimes, the resolution may be accepted, as is, by the parties in the "importing" state; at other times, further discussion is held that may produce additional modifications. Those modifications, themselves, may then be "exported" to the other Ameritech states for further discussions, as well. Indiana has benefited already from this informal regional process – e.g., from the Statement of Principles documents from Wisconsin and Ohio and from the Wisconsin "A – AA" list. We hope to benefit, as well, from the pre-test efforts that are taking place in Michigan. Discussions in Indiana regarding the applicability of the SBC/Ameritech "Plan of Record" required under the FCC Merger Order led to similar – if not identical – agreements on certain "change management" issues in other states (e.g., the scope of testing of LSOG 4).

Notwithstanding the benefits from these quasi-regional agreements, this Commission must ultimately concern itself with the impact of its decisions in this proceeding on both the nature and extent of local exchange competition and the public interest. This concern extends to OSS testing, as well. We must be certain that, under any OSS testing in the Ameritech region (either "for" or "in" Indiana), Indiana interests are adequately represented and protected.

Following are three sets of questions about various regional and state-specific aspects of OSS testing. The answers should be reflected in future drafts of the Indiana MPT and, where applicable, in Statement of Work Documents, vendor contracts, or other documents that the Collaborative may submit to the Commission. The parties are expected to go beyond assertions or opinions in their responses; we are more interested in facts, information, documentation, and analysis. There must be a process in place to verify or test assertions, opinions, or assumptions. This process must be identified and explained to the Commission.

CAUSE NO. 41657

Potential Commonality of Ameritech/Indiana Bell OSS

1. From KPMG's empirical experience in the Verizon, Qwest, or other OSS tests, what have they observed with regard to commonality of:
 - systems
 - processes
 - procedures
 - business rules
 - union rules

Many parties may have made certain assumptions about the commonality of OSS, prior to the actual start of the OSS testing in other jurisdictions. Have these initial assumptions about commonality been borne out? If not, were the differences between the initial assumptions and the actual level of commonality discovered early in the project by interviews and analysis, or later in the testing process itself?

2. Is it the parties' understanding that there is a uniform level of commonality across the Ameritech region for each type of Ameritech's OSS [pre-ordering, ordering, provisioning, maintenance & repair, and billing]? If not, please identify the differences and explain the source(s) of those differences, disaggregated by each affected type of OSS and by state. Is there commonality "end to end," or are there exceptions? Please explain.

====> What will KPMG do to verify any assertions or assumptions in this regard?

3. The five Ameritech operating companies are all separate and distinct legal entities. A different organizational model was used in many other states in the old "Bell System." For example, Southwestern Bell Telephone, Southern Bell, South Central Bell, New England Telephone, and "Mountain Bell" were all multi-state companies. There was no "Texas Bell" or "Florida Bell" or "Kentucky Bell" or "Vermont Bell" or "Colorado." To what extent, if at all, did the separate legal status of the five Ameritech operating companies affect their operational independence or the independence of respective their systems, software, interfaces, processes, procedures, business rules, etc.?
4. Most of the attention has been paid to whether or not Ameritech's OSS are common across all five states. However, there is also a need to determine whether or not Indiana Bell's OSS are common within the state of Indiana. In general, what assumptions, if any, do the parties (and KPMG) have regarding commonality of Indiana Bell's' OSS within the state of Indiana? Is there a common level of commonality within the state of Indiana for each type of Ameritech's OSS [pre-ordering, ordering, provisioning, maintenance & repair, and billing]? If not, please identify the differences and explain the source(s) of those differences, disaggregated

CAUSE NO. 41657

by each affected type of OSS. Is there commonality “end to end” within Indiana Bell’s service territory or are there exceptions? Please explain.

==>What will KPMG do to verify any assertions in this regard?

5. There are two areas of the state of Indiana in which Indiana Bell is the ILEC and that are contained within the metropolitan area of a large city located in another state – e.g., northwestern Indiana (Chicago, IL); and southeastern Indiana (Louisville, KY).
 - Portions of Indiana Bell’s service territory in northwestern Indiana were once under some degree of management or control by Illinois Bell. To what extent did this affect the processes, business practices and procedures, etc. (both historical and current), of Indiana Bell? To the extent that any assets of Indiana Bell were once owned by Illinois Bell, how, if at all, did this affect the OSS, processes, business practices and procedures, etc. (both historical and current), of Indiana Bell?
 - What influence, if any, did the proximity of South Central Bell to some of Indiana Bell’s operations and facilities in southeastern Indiana have on the historical or current processes, business practices and procedures, etc., of Indiana Bell?
6. How will the mix of products and market segments being tested be distributed across switch types, software generics, and demographic cohorts – both within the Ameritech region and “for”/”in Indiana Bell? Would the distribution of switch types influence if a test were considered duplicative? (If, at an extreme, Ameritech served all of its Wisconsin service territory by Nortel switches and all of its Indiana territory by Lucent switches, which tests might be duplicative? Similarly, could a test executed in rural WI be considered duplicative of a test in urban IN?)?
7. The Commission’s August 29 Order [Paragraph C) 1.] lists five subissues under the general topic (“area”) of regional aspects of OSS third-party testing. The Commission specifically stated that “more detailed information [regarding Ameritech’s systems architecture] should be presented to and discussed in the Collaborative. The Commission further believes that Ameritech’s view of its systems architecture should be validated by the Collaborative in light of its real world experiences and should be included or referenced in the Indiana MTP” (pages 5 - 6) What written documentation can the parties (including KPMG) provide to the Commission, regarding their “real world experiences” or otherwise, to verify Ameritech’s assertions about commonality?

CAUSE NO. 41657

**Assumptions About the Level of Commercial Volumes, Both on a
Regional and on a State-specific Basis**

8. Please clarify the parties' (including KPMG) understanding of when (under what conditions, for which products and services, for which PMs, etc.) the OSS testing will involve the P-CLEC and when it will involve real CLECs, either for (or in) the state of Indiana.
9. For each of the five Ameritech states, please identify the aggregate CLEC "commercial volume" that supports the contention that sufficient commercial volumes exist "in the Ameritech region" to support the use of "real CLECs," rather than a P-CLEC, for OSS testing.
10. For each of the five Ameritech states, please identify the aggregate IBT retail "commercial volume" that corresponds to the figure(s) you provided in response to Question No. 9.
11. What assumptions about commercial volumes "within the Ameritech region" are parties (including KPMG) making that either would or would not support the use of "real" CLECs, rather than the P-CLEC, for OSS testing? For each of the following categories, please identify and explain these assumptions, as well as differences in commercial volumes that can be currently observed:
 - Differences between the five states
 - Differences between urban and rural areas
 - Differences between customer classes (residential and business)
 - Differences between products and services
 - Any other differences that a party(ies) believe(s) may support the use of "real" CLECs, rather than a P-CLEC.

Please provide any facts, information, or written documentation or analysis that supports these assumptions.

12. What assumptions about commercial volumes within Indiana Bell service territory are parties are parties (including KPMG) making that either would or would not support the use of "real" CLECs, rather than the P-CLEC, for OSS testing? For each of the following categories, please identify and explain these assumptions, as well as differences in commercial volumes that can be currently observed:
 - Differences between the five states
 - Differences between urban and rural areas
 - Differences between customer classes (residential and business)
 - Differences between products and services
 - Any other differences that a party(ies) believe(s) may support the use of "real" CLECs, rather than a P-CLEC.

Please provide any facts, information, or written documentation or analysis that supports these assumptions.

CAUSE NO. 41657

Potential Duplication of OSS Testing Efforts in the Ameritech Region

13. How will tests that are by their nature best done on a multi-state basis (e.g. volume tests) be identified, coordinated, and executed?
14. Is it possible that a test would meet the specifications in the MTP but not be considered duplicative - due, for example, to differences in processes, work rules, or other factors?
15. What procedures will KPMG use to review OSS tests in other Ameritech/SBC states and determine if they are applicable in Indiana?
16. To what extent does the determination of whether a particular test is "duplicative" depend upon the extent of the commonality of the OSS that is being tested?
17. To what extent does the determination of whether a particular test is "duplicative" depend upon assumptions about the level of commercial volumes - either for/in the Ameritech region as a whole or for/in a particular Ameritech state (please identify the state)?
18. Explain the "specifications listed in the Indiana MTP" that a test in another state must meet to be considered duplicative. (MTP v0.3 - ca. p. 19).
19. What, if any, physical presence will KPMG establish in Indiana? How will the number and nature of duplicative tests change the degree of physical presence?
20. If KPMG has no physical presence in Indiana, how will blindness be maintained? E.g. how will mail addresses, phone numbers, etc. be set up?
21. To the extent that KPMG does maintain a physical presence outside of Indiana, how will KPMG identify and control for problems that may occur during testing that may be caused by a carrier other than Indiana Bell or that may be associated with the OSS, network facilities, or processes and procedures of a carrier other than Indiana Bell?
22. How, if at all, will the unnumbered chart in the redlined MTP v0.3 (ca. Page 6) change as a result of duplicative tests? As a result of a greater or lesser physical presence in Indiana?
23. What, if any, physical presence will HP establish in Indiana? How will the number and nature of duplicative tests change the degree of physical presence?
24. If HP has no physical presence in Indiana, how will blindness be maintained? E.g. how will mail addresses, phone numbers, etc. be set up?
25. To the extent that HP does maintain a physical presence outside of Indiana, how will HP identify and control for problems that may occur during testing that may be caused by a carrier other than Indiana Bell or that may be associated with the OSS, network facilities, or processes and procedures of a carrier other than Indiana Bell?
26. If a test is conducted in another state, but the schedule in that state is significantly different from the Indiana schedule, what criteria will be used to determine if the test results can be used for/in Indiana, or if a separate, Indiana-specific test must be conducted?

CAUSE NO. 41657

PART III: PARITY-BY-DESIGN

Introduction

In its August 29, 2000, Order [Paragraph C) 3.], the Commission stated the following regarding parity-by-design:

There are some processes where parity is established and enforced by the basic design of the incumbent's process. A parity by design evaluation should examine Ameritech's wholesale and retail end-to-end processes, the results of the same queries made to the two processes, and all additional avenues of follow-up or recourse available to either wholesale or retail operations or both. The Collaborative should consider how parity by design would be included in the MTP and how such processes would be evaluated by the TA. This will serve as guidance to the TA in the preparation of an Indiana MTP.

Our preliminary review of the Second Joint Progress Report (page 4), as well as the current iteration (0.3 Draft) of the Indiana MTP (Table III-2, page 16), suggests that the parties in the Ameritech region may not be familiar with the concept of parity by design and that further explanation is necessary on our part.

Definition

Performance measurements are the yardsticks or standards to which SBC/Ameritech OSS *performance* is compared. There are four primary types of quantitative performance measures:

- Parity measurements
- Benchmarks measurements
- Diagnostic measurements
- Parity-by-design measurements

Because natural randomness is inherent in any performance, statistical methods (defined in the current version of the Indiana MTP in Appendix C) are used to distinguish differences that are significant enough to not be explained merely by randomness.

A parity measurement is a yardstick that is calculated through measurement of a particular aspect of access to, functionality and performance of SBC/Ameritech OSS in support of its wholesale CLEC and retail operations.

CAUSE NO. 41657

A benchmark measurement is a yardstick that is calculated and compared directly with a fixed level of performance (percentage or interval). In the context of the remedy plan, the IURC's November 9, 2000, Docket Entry contained the principle that "Techniques including, or similar to, "stare and compare" will be used for performance measures with a benchmark standard. A detailed rationale must be used if statistical analysis is used for performance measures with a benchmark standard" [Principle No. 19]. Generally, benchmark measurements are used where there are no analogous operations that can be compared between SBC/Ameritech retail and wholesale operations.

In addition to parity and benchmark measurements, there are also diagnostic and parity-by-design measurements, for which no standards are set. These are designed primarily for data gathering only. Results from diagnostic measurements are used, where useful, in understanding the context of parity or benchmark measurements. Parity by design occurs when the inherent design of the relevant process is such that retail and wholesale transactions or data streams are systemically indistinguishable from each other. One of the objectives of the OSS test is to provide a verification that parity-by-design measurements are indeed at parity due to the design of the data or traffic delivery process.

Examples of retail and wholesale business processes that may achieve parity by design include:

- Time to update databases, e.g. E911 databases
- Accuracy of database updates
- Speed of Directory Assistance answer
- Percentage of DA calls answered within 10 seconds (or some other amount of time)
- Speed of Operator Services answer [primarily non-branded]
- Percentage of OS calls [primarily non-branded] answered within 10 seconds (or some other amount of time)

The Automatic Call Distributor and the human "behind" the ACD providing operator services presumably cannot tell whether a call originates from a retail or wholesale end user. Therefore the business processes for time to answer and percentage of calls answered in 10 seconds would provide parity through the inherent design of the process.

Testing Issues

We anticipate that there will be a relatively small number of instances of parity by design, based upon our understanding of the experiences in other parts of the country and

CAUSE NO. 41657

of other BOCs. Nonetheless, it is important for all concerned to understand the concept and to structure both the testing and the applicable written documents accordingly.

In those instances in which there is assertion or a belief that parity by design exists (or may exist), the parties may elect – for whatever reason – to, *a priori*, ignore these assertions or beliefs and to compare the retail and wholesale performance in the “normal” fashion – i.e., to test the retail and wholesale performance separately, on an end-to-end basis. In other words, adopting a parity-by-design designation is optional, in the context of OSS testing: parties always have the option to assume that parity-by-design does not exist and test accordingly. However, in those instances in which the PM Auditor has confirmed that the design implementation for particular portions of Ameritech’s retail and wholesale OSS are identical, then KPMG need not conduct separate tests of the retail and wholesale performance. Such separate tests would not provide any additional information – again assuming that the PM Auditor has first confirmed that the design implementation for particular portions of Ameritech’s retail and wholesale OSS are identical. However, KPMG must still conduct separate tests (and compare the results) of the retail and wholesale performance for those OSS categories (pre-ordering, ordering, provisioning, maintenance & repair, and billing) in which the retail and wholesale OSS design implementations are not identical.

Again, we reiterate that testing as if there is parity by design is optional; we are not requiring it. However, for those PMs that are affected, KPMG (as the PM Auditor) must confirm the existence of parity by design as a prerequisite to testing as if there is parity by design. In any event, where parity by design is confirmed, parties will need to make sure that existence of parity by design, the use of parity by design as an evaluation criterion, and the test results are properly reflected in the MTP and other documents.³

Relationship to “Parity with a Floor

All of the normal controversies surrounding the use of parity measures can arise where parity-by-design is asserted or believed to exist – especially if the ILEC’s service level to its own retail customers is below a particular standard or requirement. CLECs may argue that parity with a substandard retail performance level penalizes the CLECs’ ability to provide the desired (or required) service quality level to their own retail customers. Ameritech may argue that CLECs are trying to force Ameritech to provide superior performance (i.e., superior to what Ameritech provides its own retail customers). There is one key distinction between parity-by-design and parity-by-performance, however, that parties should consider. Where true parity by design actually does exist, it

³ Written documents that could be affected by an assertion of parity by design include, but are not necessarily limited to the Master Test Plan, the list of Indiana performance measures, and the PM Audit requirements.

CAUSE NO. 41657

is impossible for the ILEC to give different levels of performance to its wholesale and retail customers: the wholesale performance can never be worse than the retail performance, but it can never be better, either – again, subject to random disturbances or unanticipated factors outside of the design specifications, themselves.

Conclusion

Parties are instructed to revise and update their responses to Paragraph C) 3. Of the August 29 Order, based upon the explanation in this Attachment. At a minimum, this will require revisions to the Second Joint Progress Report and Table III-2 in the Indiana MTP (0.3 Draft). Parties will also need to consider how to incorporate parity by design issues into the list of Indiana performance measures, as well as the PM Audit and the various documents governing the PM Audit and PM Auditor – including, but not necessarily limited to, the Indiana MTP and KPMG's Statement of Work